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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PARNELL COLVIN,

Plaintiff,

vs.

M.J. DEAN CONSTRUCTION, INC.;
DOES I through X; AND ROE
CORPORATIONS XI-XX, INCLUSIVE,
inclusive;

Defendant.

Case No.: 2:20-cv-01765-APG-EJY

**NOTICE OF NON-OPPOSITION TO
DEFENDANT'S MOTION TO RE-OPEN
DISCOVERY AND EXTEND DEADLINE TO
FILE DISPOSITIVE MOTIONS**

COMES NOW Plaintiff Parnell Colvin ("Mr. Colvin" or "Plaintiff"), by and through his attorneys of record, Jesse Sbaih & Associates, Ltd., and hereby notifies this Honorable Court that he has no opposition to re-opening of discovery for sixty (60) days requested in the Motion to Re-Open Discovery and Extend Deadline to File Dispositive Motions filed by Defendant M.J. Dean Construction Inc. ("M.J. Dean" or "Defendant"), as long as discovery is re-opened with respect to both parties.

Additionally, Plaintiff has no objection to extension of the deadline to file dispositive motions by sixty (60) days as requested in the Defendant's motion.

Plaintiff's counsel hereby advises the Court that defense counsel did not cite to his health issues in his communications to Plaintiff's counsel in relation to his request for re-opening of discovery. Had Plaintiff's counsel been made aware of Mr. Rosenthal's ongoing health issues, she would have agreed

1 to Mr. Rosenthal's request without the need for filing of a motion, as she has done in the past.
2 Plaintiff's counsel is sympathetic to Mr. Rosenthal's condition and wishes him speedy recovery.

3 DATED this 4th day of June, 2021.

4 JESSE SBAIH & ASSOCIATES, LTD.

5 By /s/ Ines Olevic-Saleh
6 Jesse M. Sbaih (#7898)
7 Ines Olevic-Saleh (#11431)
8 The District at Green Valley
9 170 South Green Valley Parkway, Suite 280
10 Henderson, Nevada 89012
11 *Attorneys for Plaintiff*
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CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5(b), I certify that I am an employee of the law firm of Jesse Sbaih & Associates, Ltd., and that on this 4th day of June, 2021, I caused **NOTICE OF NON-OPPOSITION TO DEFENDANT'S MOTION TO RE-OPEN DISCOVERY AND EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS** to be served via electronic service to the following:

Martin A. Little, Esq.
Robert L. Rosenthal, Esq.
Howard & Howard Attorneys PLLC
3800 Howard Hughes Pkwy, Suite 1000
Las Vegas, NV 89169
Attorneys for Defendant

/s/ Ines Olevic-Saleh
An employee of Jesse Sbaih & Associates, Ltd.